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*Attorneys for The Travelers Home and  
Marine Insurance Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MAXWELL B. WILLIAMS and CLAIRE N.  
WILLIAMS, individually,

Plaintiffs,

vs.

THE TRAVELERS HOME AND MARINE  
INSURANCE COMPANY and THE  
TRAVELERS INDEMNITY COMPANY;  
DOES I-X; AND ROE CORPORATIONS I-X,

Defendants.

CASE NO. 2:20-cv-01669-JAD-BNW

**STIPULATION AND ORDER  
EXTENDING ALL DISCOVERY  
DATES FOR 90 DAYS**

**(First Request)**

IT IS HEREBY STIPULATED AND AGREED by Plaintiffs Maxwell B. Williams and Claire N. Williams (collectively "Plaintiffs") and Defendant The Travelers Home and Marine Insurance Company ("THMIC") by and through their respective counsel, that all discovery deadlines be extended by 90 days.

This is the parties first request to extend any discovery deadlines in this matter.

Pursuant to Local Rule 26-3, the parties state as follows:

**I. DISCOVERY COMPLETED TO DATE**

- The parties conducted the Fed. R. Civ. P. 26(f) conference.
- The parties have exchange initial disclosures of documents and list of witnesses.
- Plaintiffs have served their first set of written discovery on THMIC. THMIC's responses are due by January 4, 2021.

**II. DISCOVERY TO BE COMPLETED**

- THMIC's Responses to previously served written discovery requests.
- Additional Written discovery specific to this action.
- Depositions of the parties.
- Depositions of additional non-party fact witnesses.
- Expert witness discovery including disclosure of experts and expert depositions.
- Identification of rebuttal experts including disclosures of rebuttal experts.
- Subpoenas to non-parties.

**III. REASONS WHY THE DEADLINES CANNOT BE COMPLETED WITHIN THE CURRENT SCHEDULE**

Good cause exists to extend the discovery schedule in this matter. THMIC has filed a Motion to Dismiss many of Plaintiffs' causes of action in this matter. Should all or some of the causes of action discussed in the Motion be dismissed, the issues in this matter will narrow significantly. Prior to engaging experts and incurring the associated fees therewith, the parties agree that all parties would be better served if the Motion to Dismiss be decided before incurring these costs. Additionally, the ongoing COVID-19 pandemic as well as the dates falling during or right after the holiday season necessitate the additional time.

**IV. PROPOSED SCHEDULE**

Accordingly, the parties hereby agree and stipulate to a 90-day extension of discovery dates as follows:

EVENT	CURRENT DATE	PROPOSED DATE
Discovery Cut-Off Date	3/16/2021	<b>6/14/2021</b>
Add Parties/Amend Pleadings	12/16/2020	<b>3/16/2021</b>
Initial Expert Disclosure	1/15/2021	<b>4/15/2021</b>

Rebuttal Expert Disclosure	2/15/2021	5/17/2021
Dispositive Motions	4/15/2021	7/14/2021
Pre-Trial Order	The Joint Pre-Trial Order shall be filed no later than 30 days after the date set for filing dispositive motions which will be 5/17/2021  If dispositive motions are timely filed, the date for filing the Pre-Trial Order shall be suspended.	<b>The Joint Pre-Trial Order shall be filed no later than 30 days after the date set for filing dispositive motions which will be 8/16/2021</b>  <b>If dispositive motions are timely filed, the date for filing the Pre-Trial Order shall be suspended.</b>
Last Day to Request an Extension of these dates	2/23/2021	5/24/2021

DATED this 8<sup>th</sup> day of December 2020

BROWN, BONN & FRIEDMAN, LLC

By: /s/ Thomas Friedman, Esq  
Thomas Friedman (NV Bar No. 7708)  
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*Attorneys for Maxwell B. Williams and  
Claire N. Williams*

DATED this 8<sup>th</sup> day of December 2020

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*Attorneys for Travelers Home and Marine  
Insurance Company*

## ORDER

### IT IS SO ORDERED

**DATED:** 4:48 pm, December 11, 2020

**BRENDA WEKSLER**  
**UNITED STATES MAGISTRATE JUDGE**